

April 21, 1998

1. PURPOSE OF REVIEW
2. METHOD USED IN REVIEW
3. GENERAL COMMENTS
4. RECOMMENDATIONS

1. The purpose of the present review is adequately described by John Hope II in his report on the advisability of the "Self-Survey of New Jersey Minority Policies and Their Administration and Implementation by the DAD from 1945 to the Present."

"The purpose of this survey is first, to provide an objective basis for evaluating the effectiveness of the state non-discrimination policy as established mainly by the New Jersey State A-D law (including its legal interpretations, and other significant decisions and directives) and the application of this policy by the DAD for the past decade; and second, to prepare jointly recommendations for the efficient and adequately comprehensive implementation of this policy in the future."

2. The review was accomplished by comparing the law and its interpretations with reports of cases investigated and closed. By studying the annual reports. By personal interview with staff personnel and through discussion with representatives of civic organizations having contact with DAD in carrying out their respective program.

3. Administration - The administrative structure appears top heavy in its practical application to the areas of operation and the load being carried. That the pressure of administration has made itself felt is shown in the recent change in the structure of the compliance division wherein Ishem Jones is acting as supervisor in that division and is assigning and reviewing cases so as to relieve Harold Lett of some of the detail of directing the compliance division. The current roles of Lett and Jones are not clearly defined and it was obvious that the field staff were not sure as to who did what. The manual contains no description of the supervisory duties of Lett and Jones in the compliance division.

A growing area of operation that requires administrative attention is the provision in the law covering publicly assisted housing. There is a growing public awareness of discrimination in housing and it is obvious that DAD already called upon to explain this provision, will become increasingly involved in this activity. It is logical to have the Asst. Director assume responsibility for developing this phase of the work. It should also be noted that this field is so complex and requires such a multitude of fact finding and explanation that with the police training program it is difficult to visualize the Asst. Director involved in anything else for some time.

Compliance - The case investigation process needs to be reviewed in an open staff discussion. The manual gives an excellent format for the investigation of a complaint and human frailties require that a manual of operations be read and reread in order to maintain a standard approach. Field representatives admitted they rarely looked at their manuals and when questioned on certain specific items of procedure all said they presumed it was explained in the manual although they did not know the answer at the moment. The item being questioned was not in the manual.

An addition to the manual should be an individual explanation of the meaning of the terms used for closing cases.

In reading cases time and again it was found that in the course of investigating a complaint information on the total plant operation would be obtained and so scattered throughout the entire case record that it was difficult to determine what was pertinent to the complaint and what was just general information.

On closed cases no indication of any follow-up procedure was evident. It is understood that a card file tickler system is being organized but each case record should have as a part of the closing report a statement regarding follow-up i.e. when and what information to be obtained. The question also arises as to the purpose and worth of all the "extra" information obtained unless it is to be used in follow-up operations. A form for collateral information might be devised which would accommodate the "extra" data obtained about a company and thus keep the record directly involved with the complaint proper.

In the manual procedure and in practice it becomes necessary at times for the field representative to confer with the supervisor on the next steps to be followed in the investigation of a case. No indication of such consultations were found in the records. A dated notation of such a conference and the steps agreed upon should be a part of the case record.

An area that should be reviewed is the role of the field representative in adjusting complaints in the field. This too is not too clear among the field representatives. Some feel that they should complete a case if possible while facing the respondent. Others felt that all they are supposed to do is make an investigation and bring the facts to the supervisor. The manual provides the latter procedure. Other commissions have found field representatives capable of effecting voluntary conciliations contingent upon headquarters approval.

Initial interview

- ✓ (1) Harold Lett should be assigned the job of developing a full scale educational and investigational program in the housing field.
- ✓ (2) Isham Jones position in supervising compliance be clarified.
- ✓ (3) Periodic review of administrative and compliance processes be instituted.
- ✓ (4) The manual be reviewed and brought up to date with an explanation of closing terms.
- ✓ (5) Separation in case records of the complaint information and that of a general nature. A form could take care of the overall picture of a respondent's policies.
- ✓ (6) Follow-up procedure be formalized and spelled out in the closing of such case requiring a follow-up.
- ✓ (7) Include date and decisions of case conferences in case record.
- ✓ (8) Restudy role of field representative in field to see if he cannot become more than just a "fact gatherer".

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